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New Jersey Department of Environmental Protection  
and the Administrator of the New Jersey Spill Compensation Fund*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA; )  
NEW JERSEY DEPARTMENT OF )  
ENVIRONMENTAL PROTECTION; )  
and ADMINISTRATOR, NEW JERSEY SPILL )  
COMPENSATION FUND )  
Plaintiffs, )  
v. ) Case No. 2:22-cv-03245  
CORNELL DUBILIER )  
ELECTRONICS, INC. )  
Defendant. )

## **CONSENTED-TO MOTION TO ENTER CONSENT DECREE**

Plaintiffs, the United States of America, the New Jersey Department of Environmental Protection (“NJDEP”), and the Administrator of the New Jersey Spill Compensation Fund (“Administrator”), respectfully request that the Court enter the proposed Consent Decree lodged with the Court on May 31, 2022. *See* ECF No. 2-1. No proposed order is attached because the Consent Decree contains a signature block for the Court on page 24 at ECF No. 2-1, PageID: 48.

For the reasons set forth in the accompanying Memorandum, the Plaintiffs request that the Court enter the Consent Decree as a final judgment by signing it on page 24 at ECF No. 2-1, PageID: 48.

Respectfully submitted,

*For Plaintiff United States of America*

ELLEN M. MAHAN  
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March 3, 2023  
Dated

*s/ Patrick B. Bryan*  
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March 3, 2023

Dated

s/ Thomas Lihan  
THOMAS LIHAN  
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OF COUNSEL:

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## **CERTIFICATE OF SERVICE**

I certify that on March 3, 2023, I electronically filed the foregoing *Consented-To Motion to Enter Consent Decree* using the Court's CM/ECF system, which will send a notice of such filing to all counsel of record, and also served copies of same by e-mail upon the attorneys listed below.

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